

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

COOPER MOORE and ANDREW GILLETTE, on
their own behalf and on behalf of all others
similarly situated,

Plaintiffs,

v.

ROBINHOOD FINANCIAL LLC, a Delaware
limited liability company,

Defendant.

Case No. 2:21-cv-01571-BJR

**STIPULATED MOTION AND ORDER FOR
EXTENSION OF SCHEDULING ORDER**

I. STIPULATED MOTION

1. On January 26, 2023, the Court entered its Order Setting Case Schedule (ECF No. 69), outlining the deadlines for the case through trial.

2. The parties have been diligently conducting discovery for several months. Both sides have been working to make document productions, provide supplemental written responses, and conduct discovery with relevant third parties. Additionally, the parties have been discussing deposition scheduling.

3. The parties are also addressing discovery disputes. One such dispute was heard by the Court on March 22, 2023 and resulted in Defendant being required to produce additional documents. Moreover, Defendant is currently seeking documents from a third party which is the subject of three motions to quash pending in the Southern District of New York. The hearing on the motions to quash is currently set for April 24, 2023.

4. The current deadline for the completion of class certification fact discovery is April 28, 2023. The parties agree that, despite their diligent efforts, they both require

1 additional time to complete outstanding document productions and review, and to take fact
2 depositions.

3 5. Defendant is in the process of searching for and producing responsive
4 documents, and has committed to making all reasonable efforts to complete its productions for
5 the class certification fact discovery period by June 20, 2023, and to keep Plaintiffs updated
6 should it be unable to meet this commitment.

7 6. Therefore, the parties stipulate and agree to the following proposed extended
8 schedule, subject to the Court's approval:
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Event	Current Date	Requested Date
Deadline for class certification fact discovery	April 28, 2023	July 28, 2023
Plaintiffs' expert report(s) served on defendant	May 19, 2023	August 21, 2023
Defendant's expert report(s) served on plaintiffs	June 23, 2023	September 25, 2023
Plaintiffs' rebuttal expert report(s) served on Defendant	August 7, 2023	November 7, 2023
Deadline to complete class certification expert discovery	August 21, 2023	November 21, 2023
Deadline for Plaintiffs to file motion for class certification	September 4, 2023	January 10, 2024
Deadline for Defendant's class certification response	October 2, 2023	February 7, 2024
Deadline for Plaintiffs' class certification reply	October 16, 2023	February 28, 2024
Fact discovery cut off	July 22, 2024	September 23, 2024
Disclosure of expert testimony under FRCP 26(a)(2)	August 26, 2024	October 25, 2024
Expert discovery cutoff	September 23, 2024	November 22, 2024
Dispositive motion deadline (including motions regarding experts)	October 25, 2024	January 24, 2025

Deadline to file proposed pretrial order (including joint pretrial statement), proposed joint <i>voir dire</i> , proposed jury instructions, proposed verdict form, and motions in limine (to be filed in a single, joint brief)	January 8, 2025	April 2, 2025
Deadline to file oppositions to motions in limine (no replies will be permitted)	January 15, 2025	April 9, 2025
Pretrial conference	January 23, 2025	April 17, 2025
Trial	February 2, 2025 (or at the court's convenience)	May 5, 2025 (or at the court's convenience)

Based on the foregoing, the parties respectfully request that the Court grant their motion and extend the case schedule accordingly.

STIPULATED TO AND DATED this 17th day of April, 2023.

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II. ORDER

The Court GRANTS the parties' stipulated motion.

IT IS SO ORDERED on this 18th day of April, 2023.



HONORABLE BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT JUDGE